

DEPARTMENT OF THE ARMY HEADQUARTERS, U.S. ARMY OPERATIONS SUPPORT COMMAND 1 ROCK ISLAND ARSENAL ROCK ISLAND, IL 61299-6000

AMSOS-CG (700-15a)

19 FEB 2002

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: European Community (EC) Decision on the Entry of Non-Manufactured Wood Products (NMWP) Into Europe

- 1. Reference memorandum, Under Secretary of Defense for Acquisition and Technology, 8 September 2001, SAB (enclosure 1).
- 2. The referenced memorandum provides overall DoD policy regarding the EC Emergency Decision. The EC and its member countries have accepted the proposed implementation plan presented to them by the US Department of Agriculture in September 2001. The United Nations International Plant Protection Convention (IPPC) is currently drafting similar measures that will affect wood packaging for all international shipments. The purpose of this memorandum is to provide Operations Support Command (OSC) policy guidance to satisfy both the EC and IPPC measures.
- 3. This memorandum addresses procurement of wood and wood products for new production, inspection, and certification of existing stocks, Army pre-positioned stock, and training.
- 4. Procurement of wood and wood products: all containers and pallets produced entirely or in part from NMWP shall either be constructed of wood heat-treated to a core temperature of 56 degrees centigrade for 30 minutes or the products themselves heat-treated to a core temperature of 56 degrees centigrade for 30 minutes. These materials will be certified accordingly by an accredited agency recognized by the American Lumber Standards Committee (ALSC), in accordance with the Non-manufactured Wood Packing Enforcement regulations. Certification markings will be applied to all boxes and all other wood packing materials.
- 5. Inspection and certification of existing stocks (this refers to all stock that is not already marked "heat-treated"): Enclosure two explains packaging and shipment of existing stock, including Army Prepositioned Stocks (APS). This guidance is

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effective immediately for all shipments into EC countries and after April 2003 for all shipments to non-EC countries. Dunnage, blocking, and bracing materials must also be certified as heattreated beginning April 2003. Prior to April 2003, all dunnage will be inspected and certified that it is pest free IAW paragraph 2b of enclosure 2. There is no requirement to mark the dunnage material itself; instead, this will be marked on the Certificate of Inspection.

- 6. The Defense Ammunition Center (DAC) developed a training program that will be made available to all installations.
- 7. This policy applies to all EU shipments and all international shipments beginning in April 2003. All contracts for new procurement will comply with the NMWP directive. If an Item Manager/PM/Customer does not believe an item has a reasonable chance of being shipped outside the US, a written request for deviation must be submitted to the Director, Stockpile/NICP, ATTN: AMSOS-SN, Rock Island, IL 61299-6000.
- 8. Enclosure 3 explains cost impacts of compliance with these measures.
- 9. The POCs are Mr. Jay Lundberg, SOSMA-SNT, DSN 793-2318 or (309) 782-2318, E-mail lundbergj@osc.army.mil or Mr. Rick Nesbitt, SOSMA-SNP, DSN 793-6572 or (309) 782-6572, E-mail nesbittr@osc.army.mil.

3 Encls

WADE H. MCMANUS, JR.

Major General, USA

Commanding

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THE UNDER SECRETARY OF DEFENSE 3010 DEFENSE PENTAGON WASHINGTON, D.C. 20301-3010



0 8 SEP 2001

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY

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ASSISTANT SECRETARY OF THE ARMY

(INSTALLATIONS AND ENVIRONMENT)

ASSISTANT SECRETARY OF THE NAVY

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(MANPOWER, RESERVE AFFAIRS, INSTALLATIONS AND

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DIRECTOR FOR LOGISTICS, JOINT STAFF (J-4)

DIRECTOR, DEFENSE LOGISTICS AGENCY

DIRECTOR, DEFENSE CONTRACT MANAGEMENT AGENCY

DIRECTOR, DEFENSE COMMISSARY AGENCY

Subject: European Community (EC) Decision on the Entry of Non-Manufactured Wood Products (NMWP) into Europe

The purpose of this memorandum is to respond to the EC Emergency Decision. This measure is published in the Official Journal of the European Communities, "Commission Decision of March 12, 2001, on temporary emergency measures in respect of wood packing comprised in whole or in part of non-manufactured coniferous wood originating in Canada, China, Japan and the U.S. (Notified under document number C920010694)."

Based on concerns about invasive species, particularly the Pinewood Nematode, the EC issued an Emergency Decision on March 12, 2001, to regulate NMWP shipped into Europe. The EC decision will take effect on October 1, 2001, and from that point onward, no untreated softwoods should be shipped to Europe from listed originating countries. The United Nations (UN) International Plant Protection Convention (IPPC) is drafting a similar measure to establish international standards for NMWP and the prevention of various wood pests with an anticipated effective date of April 2003. NMWP is defined as non-manufactured wood pallets, skids, boxes, crates, etc. that has not had sufficient processing to kill pests present in the raw wood. Since most DoD cargo is palletized, crated, boxed, etc. with NMWP, the impact is significant. One of the approved methods for eliminating this pest is to heat-treat (HT) the wood so that the core temperature of each piece of treated wood will reach 56°C (133°F) for 30 minutes (56/30). Fumigation and pressure treatment are also approved methods of treating wood; however, due to environmental considerations these methods should be limited. The European decision does not affect processed wood, such as plywood, used in packaging and crating.



Effective immediately, all DoD activities will take, as a minimum, the following actions to ensure that no CONUS or U.S. originated OCONUS DoD shipments to Europe will be frustrated:

- a. Modify All appropriate contracts for materiel and direct vendor deliveries to require any/all wood lumber, pallets, boxes, crates, etc. delivered to a DoD activity, worldwide, be heat-treated under the 56/30 requirements and marked to the American Lumber Standards Committee (ALSC) NMWP policy and enforcement standards.
- b. Require that all wood pallets, boxes, crates, etc. ordered/delivered from vendors be heattreated and marked to the American Lumber Standards Committee (ALSC) NMWP policy and enforcement standards.
- c. Require that all bulk lumber procured for the fabrication of pallets, boxes, crates, etc., be certified and marked as a part of the fabrication process, to the ALSC NMWP policy and enforcement standards. Activities using ALSC-certified lumber to make or repair wooden boxes or crates, skids and pallets, etc., must have formal processing procedures and documentation to ensure that only certified lumber leaves their fabrication point.
- d. Initiate acceptable measures to ensure all existing stocks of NMWP that are destined for the EC are pest free. Once treated, these wood products must be marked to the ALSC NMWP policy and enforcement standards.
- e. Establish, in conjunction with the U.S. Department of Agriculture Animal Plant Health Inspection Service (the U.S. lead for this matter), ALSC or an ALSC-accredited agency, acceptable procedures for inspecting softwood and hardwood pallets, boxes, crates, etc. for signs of pest infestation (i.e., worm holes greater than 3mm in diameter; presence of bark; grub marks; and, an average moisture content of greater than 20 percent).
- f. Inspect, certify, replace or treat wood pallets, boxes, crates, etc. on all pre-positioned vessels, during routine rotation cycles.
- g. Ensure all DoD shippers create an inspection/verification routine to ensure all wood pallets, boxes, crates, etc. leaving CONUS and OCONUS shipping activities, destined for Europe, meet the EC Decision.
- h. Ensure that all non-coniferous (unregulated) wood used in shipments be identified and certified as exempt from the EC decision.

Although shipments to European destinations are a priority for this effort, DoD activities should begin to make this a standard procedure for all shipments worldwide in anticipation of the pending U.N. decision on pest control.

E. C. Akiridee Jr.

COMMANDANT, U.S. MARINE CORPS COMMANDANT, U.S. COAST GUARD COMMANDER, US TRANSCOM

PACKAGING AND SHIPMENT OF EXISTING STOCK

1.Packaging:

- a. Effective immediately, all packaging operations will use heat treated NMWP for international shipments.
- b. There will not be a total repack of existing stock. Installations will repack only as necessary incidental to shipment.
- c. Only the procuring command's packaging engineering personnel can authorize changes to item packaging requirements.

2. Shipment:

- a. Installations will use present inventory for CONUS shipments whenever practical.
- b. All existing NMWP will be inspected prior to international shipment, as follows:
- (1) If the NMWP is under 5 years old, inspect to ensure that there are no wormholes greater than 3mm in diameter; that there is no bark; and that the average moisture content is less than 20 percent. Moisture meters will comply with the criteria at Attachment 3. Pallets will not be depalletized for inspection purposes. Visible surfaces only need to be inspected.
- (a) If NMWP meets the inspection criteria, certify the material as pest free by checking the appropriate box on the form at Attachment 1 and by applying the Pest Free tag at Attachment 2 to at least two sides of pallet load (not top or bottom). Affix Attachment 1 to the inside of the shipping container door. If boxes are not part of palletized load, each box will be marked once on one side.
- (b) If NMWP does not meet any one of these criteria, the item shall be re-packed into compliant packaging material.
- (2) If the NWMP is over 5 years old, follow steps in paragraphs (1), (a), and (b) above, except that moisture content readings are not required.

- (3) Installations that produce wood packaging material will purchase compliant material from an ALSC certified manufacturer.
- (4) An effective audit trail is required at each installation.
- 3. Army Prepositioned Stocks (APS):
- a. During routine maintenance cycles of APS vessels, repacking, inspection, and certification, as identified in paragraph 2b(2).
- b. APS material currently prepositioned overseas does not require inspection or repack; until such time that they will be shipped to another country. At that time, follow procedures in paragraph 2b(2).
- c. Item managers of CONUS-based APS material and operational projects shall ensure that this material is compliant.



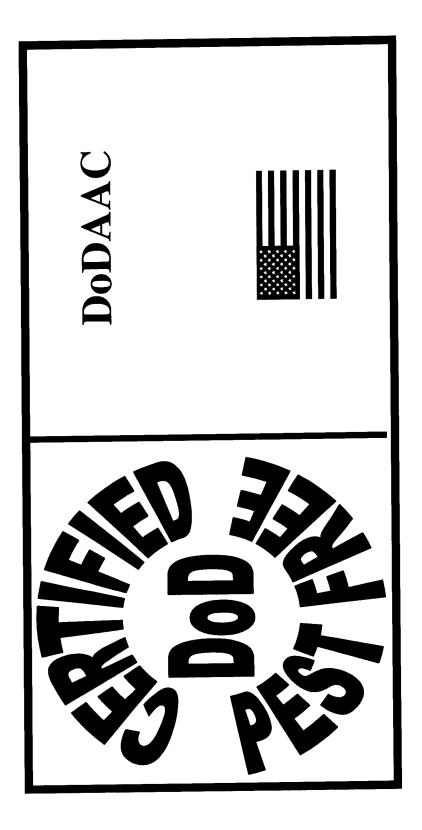




CERTIFICATE of INSPECTION of Non-Manufactured Wood Packing (NMWP)

of
(name of activity)
THE DEPARTMENT OF DEFENSE of the UNITED STATES of AMERICA, located at performed an inspection of NMWP
(city and state)
on·
on (NSN and/or nomenclature/container)
The non-manufactured wood packing materials complies with one of the following requirements.
Inspection of packing materials five years and older, verifying the following information:
This Non Manufactured Wood Packing Material has been found to be stripped of its bark and free from grub holes defined for this purpose as those that are larger than 3mm acros caused by the genus Monochamus (Non-European Species).
Inspection of packing materials less than five years old verifying the following information:
This Non Manufactured Wood Packing Material has been found to be stripped of its bark free from grub holes defined for this purpose as those that are larger than 3mm across caused by the genus Monochamus (Non-European Species) and having moisture content less than 20%.
Moisture content
Dunnage material has been heat-treated (required beginning April 2003)
Inspection completed by(signature, title and date)
(signature, title and date)

DoD Stamp/stencil for PWN free wood



This stamp may be produced in black and white. Color is not required.

Attachment 2

CRITERIA FOR MOISTURE METERS

- 1. Should be pin (probe) type of meter. Safety of Radio frequency models cannot be verified for all ammunition. Hammer type probes are recommended for greater durability, but are not mandatory.
- 2. Should have species correction. A chart for conversion from instrument reading to moisture content will come with the product. Models that don't require this step are less accurate.
- 3. Should have temperature correction. Models without are less accurate.
- 4. Should have accuracy of 2% moisture content or better.
- 5. Should be able to read a moisture range of 6 25%.
- 6. Should be able to recharge the model by battery replacement or other means.

Cost Impacts of European Community (EC) Decision on the Entry of Non-Manufactured Wood Products (NMWP) Into Europe

- 1. Total cost impacts are unknown at this time; however, it is estimated that total impact will be about 0.6 percent.
- 2. The FY 2002 Execution Price List will reflect a projected percentage that will be added to the End Item LAP/Complete Round elements to offset the price impact of the nematode issue on conventional ammunition. This percentage will not be applied to Radford/Holston components bought as end items nor will it be applied to the AWCF installation prices (increased costs is a part of the AWCF Net Operating Result (NOR) and will be incorporated into their out year prices).
- a. Cost impacts by item will be incorporated into the FY 2002 base price build (Mar/Apr 2002) for costing the FY 04 and out budget buys. The end items that do not have cost data will again reflect a projected percentage to offset the price impact.
- b. The fiscal year 2003 Execution Price List will reflect the 2002 base price build and/or actual contract prices containing the nematode issue impacts.

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